

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE ELECTRIC LAST MILE
SOLUTIONS, INC. SECURITIES
LITIGATION

Case No. 2:22-cv-00545-MEF-LDW

CLASS ACTION

Motion Day: September 20, 2024

**NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that pursuant to the Court's Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement (ECF No. 131), on September 20, 2024 at 9:15 a.m., Lead Plaintiff Jun Zheng and named plaintiff Scott T. Hacker ("Plaintiffs")¹ will move this Court, The Honorable Michael E. Farbiarz, United States District Judge of the United States District Court for the District of New Jersey, 2 Federal Square, Courtroom #4, Newark, New Jersey, for entry of an order granting final approval of the proposed class action Settlement, approving the Plan of Allocation for distribution of the Net Settlement Fund, and certifying the Settlement Class for settlement purposes.

In support of this motion, Plaintiffs rely on the accompanying Memorandum of Law, the Declaration of Laurence Rosen and exhibits thereto, all filed contemporaneously herewith, the pleadings and records on file in this action, and such further argument and briefing as may be presented at or before the Settlement Fairness Hearing. In the event that there are requests for exclusions or objections received after the date of this filing,² Plaintiffs will file an updated proposed final order and judgement with their reply.

¹ Unless otherwise defined, all capitalized terms used herein have the meanings ascribed to them in the Second Amended Stipulation of Settlement dated March 20, 2024 (ECF No. 124).

² The deadline for objections and exclusions is August 30, 2024.

Dated: August 23, 2024

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Laurence M. Rosen

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*Lead Counsel for Plaintiffs and the
Settlement Class*

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of August, 2024 a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Laurence M. Rosen

Laurence M. Rosen